

May 22, 2013

Ms. Sharon Fang
U.S. Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103

Subject: North Penn Area 5 Superfund Site Remedial Design Oversight
Work Assignment 053-RORD03W6
HGL comments on Geosyntec's Revised QAPP for Operable Unit 02

Dear Ms.Fang:

In accordance with your directions and Task 8 of Work Assignment 053-RORD03W6, HydroGeoLogic, Inc. (HGL) has reviewed the Revised Quality Assurance Project Plan (QAPP) for Operable Unit 2, North Penn Area 5 Superfund Site prepared by the Geosyntec Consultants, Inc. for the Responsible Parties. The revised QAPP adequately addressed most of HGL's comments. However, a response to the following comment is still required.

Original Comment: Section 3.5.3.3 – Laboratory control sample (LCS) duplicates are not an analytical requirement for the project methods; it should be acknowledged that LCS duplicate results may not always be available.

Geosyntec Response: Geosyntec did not respond to this comment.

HGL Rebuttal: HGL suggests revising the sentence to: "LCS duplicate (LCSD) analyses are not method requirements; however, laboratories often include LCSD data. If the laboratory has performed an LCSD, these results can be compared to the LCS results to determine analytical precision for a specific test if an MS/MSD pair is not available."

If you have any questions or comments regarding this letter, please contact me at (215) 636-0667.

Sincerely,

Ex. 4 - CBI

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Project Manager